



Injury and Illness Prevention Program

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Injury and Illness Prevention Program

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Concrete Sawing, Drilling and Breaking

A Message from the President . . .

Penhall Company hires craftsmen who are expected to perform their tasks in a professional manner. Doing the job safely is fundamental to doing the job well. As part of the Penhall team, you will be expected to conduct yourself in a safe manner at all times.

"SAFETY PAYS"

Perhaps you've heard this saying before. At Penhall we believe it. I can illustrate it this way: Practicing safety on the job could be compared to practice and warm-ups before a sporting event. At practice you refine your basic skills and techniques. During a warm-up you prepare your joints, muscles and your mind to get ready for the contest to follow. One of the primary reasons for practice and warm-ups is to prevent injury and be totally prepared for the upcoming event.

Likewise, using the proper tools, techniques and equipment will help prevent you from being injured. Attendance at safety meetings will teach you to be aware of hazards and give you the *how-to's* of accident prevention. The result should be fewer accidents or injuries to you. And that could mean money in your pocket! Although the workers compensation system provides payment of part of your income if disabled, it doesn't come close to your regular earnings. One study revealed that the average Penhall employee receives less than 40% of his customary income if he has a time loss injury. Clearly, safe conduct that avoids accidents, pays.

Safely Yours,
JOHN SAWYER
President



INJURY AND ILLNESS PREVENTION PROGRAM

I. Penhall Company's Commitment to Safety and Health

A. Safety and Health Policy

Penhall Company is firmly committed to a safe and healthful working environment. To help achieve this goal, Penhall Company has implemented a comprehensive Injury and Illness Prevention Program (IIPP). This program is designed to help prevent workplace accidents, injuries and illnesses. A complete copy of the program will be kept at the division office.

A copy of the code of safe practices (Basic Field Safety Requirements) will be given to each employee, posted or available at each jobsite. The IIPP will be referenced in the code of safe practices and will contain information on how to secure a complete copy.

B. Responsibility for Safety and Health

Every employee of Penhall Company is responsible for working safely and maintaining a safe and healthful work environment. Working safely, following safety directives and obeying company safety rules are conditions of employment. Failure to comply is cause for discipline up to and including termination. Specific safety responsibilities are outlined below.

Corporate Safety Officer

The program administrator for the Penhall Company IIPP is the Corporate Safety Officer, Steve Lemaster. Mr. Lemaster may be reached during normal business hours at (714) 772-6450. The daily administration of the local area's IIPP will often be delegated to a branch safety officer. The corporate safety officer's duties include, but are not limited to:

1. The overall implementation and maintenance of the IIPP
2. Ensuring that managers and supervisors are trained in workplace safety and are familiar with the safety and health hazards to which employees under their immediate direction or control may be exposed as well as applicable laws, regulations and Company safety rules and policies;
3. Ensuring that employees are trained in accordance with this IIPP
4. Inspecting, recognizing, and evaluating workplace hazards

5. Developing methods for abating workplace hazards
6. Ensuring that workplace hazards are abated in a timely and effective manner

The corporate safety officer may assign all or some of those tasks to other individuals within the Company. Some of the individuals who may be assigned specific IIPP tasks include, but are not limited to:

1. Branch Manager
2. Branch Safety Officer
3. Superintendents
4. Insurance Company or Broker Loss Control Representatives
5. Administrative Assistants
6. Employees

II. Hazard Assessment and Control - Identification of Workplace Hazards

A. Periodic Scheduled Inspections

1. The corporate safety officer will conduct formal safety audits twice yearly. The audits will inspect for hazards related to office, shop, vehicle and field work. A written evaluation form will be used for each area. The form will include a procedure for monitoring compliance with areas needing corrective action.
2. Safety consultants from the Company insurance carrier and broker will provide periodic inspections of general hazards in the workplace. They will report results of those inspections directly to the safety officer.
3. The Company equipment manager will perform periodic inspections of the fixed facilities, shops, vehicles, and equipment. The specific focus will be to insure ongoing compliance of safety standards and progress on corrective action directives.

B. Unscheduled Inspections

In addition to scheduled inspections and ongoing review, the corporate safety officer will arrange for unscheduled, surprise inspections. Primarily, this will be accomplished through outside consultants who will provide written reviews of jobsite compliance with the company's Basic Field Safety Requirements. This is to be done at the rate of five visits per month. The times and locations to be chosen by the safety consultants.

C. New Matters

The corporate safety officer will arrange for the inspection and/or investigation of any new substance, process, procedure, or equipment introduced into the workplace. He/she will also arrange for an inspection and/or investigation of any new or previously unrecognized hazards brought to the Company's attention.

D. Employee Reporting of Hazards

Employees are required to immediately report any unsafe condition or hazard that they discover in the workplace immediately to the attention of their supervisor or corporate safety officer. No employee will be disciplined or discharged for reporting any workplace hazard or unsafe condition. Reports may be made verbally or in writing and may be signed or anonymous. A written response will be made to each written report of any workplace hazard or unsafe condition. A copy will be given to the employee (if identified) who made the report.

E. Documentation of Inspections

Copies of all inspections will be retained at the corporate office for three years. Duplicate documentation as required by regulation may also be kept at the branch office.

III. Company Safety Rules

A. Basic Safety Rules

The company publishes a list of Basic Field Safety Requirements. A copy of the current Basic Field Safety Requirements is attached in the appendix.

B. Specific Safety Rules

Job specific safety plans are developed from time to time to meet specific hazards. Attached in the appendix are samples of specific safety procedures for past projects.

Incorporated as part of the Company safety rules are the specific safety procedures provided by the manufacturer of the products used by Company employees.

IV. Communicating Safety and Health Issues to Employees

The Company will use a variety of means to communicate with employees on safety and health issues. The most significant are noted below:

A. Safety Meetings

The branch safety officers, superintendents, and division managers will conduct safety meetings. The frequency of these meetings will be in direct ratio to the nature of the job and hazards to which employees may be exposed, but will at least meet OSHA standards. During the meetings the following issues will be discussed:

1. New hazards that may have been introduced or discovered at the workplace
2. The causes of recent accidents, injuries or near misses and the appropriate corrective action to prevent similar incidents
3. A review of the monthly safety report provided by the corporate safety officer

B. Anonymous Notification by Employees

Each employee will be advised at his/her initial orientation, periodically at safety meetings and through other written literature (e.g.: Newsletter) of their right to inform the Company of workplace hazards. The corporate safety officer will investigate all reports by employees in a prompt and thorough manner. The corporate safety officer will prepare a written response to any written notification by an employee. A copy will be given to the author of the notification or kept on file for three years if the notification was anonymous.

C. Posting

All OSHA safety notifications will be posted at each office and jobsite that has a company trailer. Various other items of safety value will be posted as appropriate. These may include current standing in the Company safety program, commercially prepared safety posters, results of safety visits, etc.

D. Newsletter

Each edition of the Company Newsletter or monthly report will contain an article on safety.

E. Training

The Company has training requirements designed to instruct each employee on general safety procedures as well as safety procedures specific to the employee's job. These training requirements are described in greater detail in Section VI of this program.

V. Enforcement of the Safety Program

A. Incentive Program (recently canceled, currently being revised)

A Company incentive program had been in place for several years that included each field employee, superintendent, shop employee and safety officer, below the rank of manager. Employees earned safety points by cooperating with the company safety program. Statements were sent out on a regular basis presenting points earned. Points were used to purchase merchandise / awards from a catalog. A new incentive program is being considered.

B. Disciplinary System

Discipline for safety reasons will be handled on the same basis as for any other business matter. This does not change the at-will status of employment at the Company. An employee found in violation of a Basic Field Safety Requirement / Code of Safe Practice may be suspended without pay.

At-fault rear end auto accidents are a special safety focus of the company. Any employee involved in an at-fault rear end accident (a rear end accident is presumed to be at fault unless it can be proven otherwise) will be automatically suspended for one week without pay.

VI. Safety and Health Training

Awareness of potential health and safety hazards, as well as knowledge of how to control such hazards, is critical to maintaining a safe and healthful work environment and preventing injuries, illnesses and accidents in the workplace. Penhall Company is committed to instructing all employees in safe and healthful work practices. To achieve this goal, the Company will provide training to each employee with regard to general safety procedures and any hazards or procedures specific to that employee's work assignment.

A. Employee Training provided to all field employees as follows:

1. Upon hiring
2. Whenever an employee is given a new job assignment for which training has not been previously provided
3. Whenever new substances, processes, procedures, or equipment that represent a new hazard are introduced into the workplace
4. Through regularly scheduled safety meetings
5. Whenever the Company believes that additional training is necessary

B. Employees will be trained in the following areas / subjects:

1. Basic Field Safety Requirements (Code of Safe Practices)
2. Hazardous-materials
 - a) Identification
 - b) Material safety data sheets
 - c) Handling
 - d) Personal protection
3. Job specific hazards
4. New hazards which may be introduced into the workplace

C. Supervisory Training

Whenever an employee is hired or promoted to a position of supervision, he/she will receive a safety orientation that includes a re-introduction to the Company IIPP and how to conduct new employee safety orientation training.

D. Documentation of Training

Each new employee will be given a copy of the Company's Basic Field Safety Requirements as part of the enrollment process. As acknowledgement of having received a copy of the most recent revision of these requirements, a second, signed copy will be forwarded to the payroll department to be included as a permanent part of the individual's file. Job specific or other subsequent training will be documented by means of the "Training Verification" form and returned to the corporate safety officer to log and review before filing. Copies will be kept for at least three years.

VII. Accident Investigation

A. Investigation Policy

Each work related accident or injury will be investigated in a timely manner with a focus on corrective action.

B. Responsibility and Procedures for Investigation

Each division or branch will assign a superintendent, the branch safety officer, or the division manager to do the initial investigation after an accident or injury. This will be done on an "Accident Report Cover Sheet". The corporate safety officer, regional manager, and company president will then review it. The corporate safety officer will evaluate and follow up on the recommendations for corrective action. The company equipment manager will assist the safety officer if the corrective action requires the modification or purchase of equipment.

VIII. Emergencies

Emergency Action Plan

Each permanent facility or long term job will post the name of the person responsible for emergency action procedures and local phone numbers for police, fire, medical and hazardous response units. An action plan which meets state and local requirements for emergency action and fire prevention plans will be kept and maintained in an accessible location, for all fixed locations and long term job sites.



★★ SAFETY NOTICE ★★

The Penhall Company written Injury and Illness Prevention Program (IIPP) and Material Safety Data Sheets (MSDS) are kept in the following location:

Your **local safety officer** is: _____

Phone No.: _____

The **corporate safety officer** is: Steve Lemaster

Phone No.: 714-578-3262

All injuries, illnesses, accidents or safety concerns should be reported to your local safety officer, superintendent or division manager. You may contact the corporate safety officer if you believe your issue is not being adequately addressed. You may report a safety concern anonymously, if desired, by writing to the corporate safety officer at:

Penhall Company, P. O. Box 4609, Anaheim, CA 92803

Your concern will be investigated and a response to the investigation will be posted for one week, next to this notice.



BASIC FIELD SAFETY REQUIREMENTS

[Code of Safe Practices]

FOR ALL EMPLOYEES:

1. Hard hats are required on all job locations.
2. All employees shall follow safety rules, render every possible aid to safe operations, and report all unsafe conditions or practices to the foreman, superintendent, or safety officer. The report should be in writing whenever possible. No employee will be disciplined for notifying the company of any workplace hazard or unsafe condition.
3. All employees must immediately report any injury, illness, or accident of any kind to the foreman or superintendent.
4. Foreman shall insist on employees observing and obeying every rule, regulation, and order as is necessary for the safe conduct of work, and shall take such action as is necessary to obtain observance.
5. Anyone known to be under the influence of drugs, intoxicating substances, or any circumstance (e.g., illness, fatigue, etc.) which impair the employee's ability to safely perform the assigned duties, shall not be allowed on the job while in that condition.
6. Horseplay, scuffling, or other actions that could adversely influence safety are prohibited.
7. Employees shall not enter manholes, underground vaults, soffit chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been determined by a competent person that it is safe to enter.
8. Employees shall be instructed to ensure that all guards and other protective devices are in place and adjusted, and shall report deficiencies promptly to the foreman or superintendent.
9. When lifting heavy objects, be prepared (warmed up), keep the load as close as possible to the body, bend the knees and lift using the leg muscles.
10. Employees must wear safe shoes. This means at the very least, leather work shoes (not athletic footwear) which are free from split seams, holes and dragging laces. Rubber boots may be worn if desired, but they must have rigid toes.
11. Respiratory equipment must be worn when there is an exposure to respiratory hazards. Training, equipment, personal fit testing, and monitoring appropriate to the hazard will be provided.
12. Orange safety vests will be worn during any street work (reflective for night work) and when appropriate, your vehicle should be placed between you and oncoming traffic.
13. Good housekeeping is essential. The proper care and attention to the location of hoses, electrical cords, standing water, miscellaneous tools and materials, etc., will be explained at safety meetings.
14. Employees shall clean thoroughly after handling hazardous substances, and follow special instructions from authorized sources. Material Safety Data Sheets (MSDS) are available through your supervisor.
15. Gasoline shall not be used for cleaning purposes. Approved and labeled safety cans will be used to store and dispense gasoline.
16. Damaged tools or equipment shall be removed from service and tagged "DEFECTIVE".
17. Materials, tools, or other objects shall not be thrown from buildings or structures until proper precautions are taken to protect others from the falling objects.
18. Ladders, scaffolds, and / or lift equipment may be provided to access elevated work areas. These must be used and maintained in accordance with the specific training provided.
19. Any work at an elevated location that presents a fall hazard to personnel or equipment will follow our fall protection program guidelines.
20. Working safely is a condition of employment. All employees must follow these and other appropriate safety directives. Disciplinary action, up to and including termination, will be taken against employees who don't observe safe work methods.

Diamond Workers:

1. Ear and eye protection will be worn while operating equipment.
2. Verify proper ventilation when operating gas powered equipment indoors. If at all doubtful about adequate ventilation, do not take chances. Use catalytic converters and fans or have electric powered machinery sent out.
3. Be aware of what is below you or on the other side of the wall when cutting or drilling. Have the area barricaded or monitored if there is any chance of concrete falling where you can not see it.
4. Ask about utilities that may be located in the concrete or just below grade. Verify with a competent person once utilities are located that they are turned off.

Laborers / Compressor Work:

1. Ear protection must be worn while operating equipment or performing labor near an operating compressor or breaking operations.
2. Eye protection must be worn whenever breaking, chipping, grinding or related work is done.
3. Air hoses should not be disconnected from compressors until the hose line has been bled. Hoses and tools will have safety clips (or similar devices) at all joints.
4. Compressed air should not be used to clean an area unless all personnel in the vicinity are properly protected. If materials are suspected to be hazardous, the area should be posted as a potentially hazardous work area.
5. Welding goggles / glasses must be worn when performing torch work. See "Rules for Use of Oxygen, Acetylene and Propylene" for complete details of these safety procedures.
6. No burning, welding, or other source of ignition shall be applied to any enclosed tank or vessel, even if there are some openings, until it has first been determined that no possibility of explosion exists, and authority for the work is obtained from the foreman or superintendent.
7. Compressed gas cylinders shall be stored in a secured, upright position, with protective caps in place.

Equipment Operators:

1. Equipment should not be operated near power lines where there is an overhead snagging exposure or in enclosed areas where there is danger of carbon monoxide poisoning.
2. Ear and eye protection must be worn when using breaking tools.
3. Equipment must be inspected for proper working order before use, and should not be refueled, repaired or adjusted while running.
4. Maximum equipment loads should not be exceeded.
5. Seat belts must be worn while operating any piece of equipment that is so outfitted.

Shop Personnel:

1. Proper eye protection must be worn when grinding.
2. Welding goggles / glasses must be worn and adequate ventilation maintained when welding or cutting.

Driving Company Vehicles:

1. Seat belts must be worn whenever operating a vehicle. The driver will be responsible for paying any fine issued for non-compliance of mandatory seat belt laws.
2. Make sure all loads are secured well through the use of tie down ropes or chains. Cover loads where appropriate to minimize loss of debris.
3. Drive defensively; this means following the 2, 3, or 4 second rule. Here's how it works:
 - a. When the driver ahead of you passes a fixed object like a tree, telephone pole, underpass or billboard, you start counting: one thousand one, one thousand two, one thousand three, one thousand four. Two seconds is used for passenger vehicles, three for pick-ups and four seconds is for larger trucks or pick-ups towing equipment.
 - b. If your vehicle reaches that fixed object before you finish counting, you are following too close and you're asking for trouble. Widen the gap until you have a proper margin for safety. Add an extra second or two under adverse conditions.

NOTE: These Basic Field Safety Requirements (Code of Safe Practices) are part of a comprehensive, written Injury and Illness Prevention Plan (IIPP). Copies are available from your supervisor and at each Penhall Company office.

I, _____ have been given a copy of, read and been instructed on Penhall's "Basic Field Safety Requirements." I understand that compliance with these and subsequent safety directives is a condition of employment at Penhall Company.

Signature

Date



OFFICE SAFETY

1. All aisles, doorways, and corners should be free of obstruction to permit visibility and movement.
2. Arrange file cabinets and storage closets so that drawers and doors do not open into walkways or doorways.
3. Chairs should be checked for loose casters, rungs, arms, and legs.
4. Check furniture for any sharp edges, points, burrs, or splinters.
5. All electrical appliances and equipment should be properly grounded or insulated.
6. All machinery with belts, wheels, fans, and other moving parts should be adequately guarded. Electrical equipment must be in good working order. Report to supervisor if not.
7. All phone lines, electrical cords, extension wires and computer cables must be secured under desks or along side baseboards. A runner must cover cords that run into or across hallways.
8. If you have personal items such as coffee makers, space heaters, radios, etc., be sure the building's electrical circuit systems can handle them.
9. Be sure all items such as scissors and razor blades have safe storage covers.
10. Be sure your desk is not cluttered with extra books, papers, file boxes, or dividers.
11. If you work with materials such as cleaning fluids, correcting fluids, glue, etc., read their Material Safety Data Sheet (MSD), and make sure you have a safe place for storage.
12. If your office is equipped with storage cabinets, keep all heavy items on lower and middle shelves. All bottles should be within easy reach.
13. All carpets must be well secured to the floor and free of debris, tools, and equipment.
14. All emergency exits must be marked and free of debris. **IMPORTANT:** Be aware of all exits and how to reach them.
15. If a step stool or ladder is part of your office equipment, be sure it is safe to reach high objects. **IMPORTANT:** Stools with rollers or casters should not be used as step stools.
16. Be sure you know where fire extinguishers are located and how to use them.



ASSURED EQUIPMENT GROUNDING CONDUCTOR PROGRAM

The Penhall Company, in compliance with section 2405.4 of the Electrical Safety Orders, implements the following procedures:

- A. All 120-volt, AC, single-phase, 15 and 20 amperes outlets on construction sites, which are not a part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground-fault circuit interrupters for personnel protection.
- B. On most construction sites the Penhall Company uses power from vehicle mounted generators exceeding 5KW or does not control the temporary power. Thus, it is impractical to inspect and test the temporary system established by others or the use of GFI circuits are not feasible. Therefore, all Penhall Company electrical equipment will be tested and labeled to comply with section 2405.4 (D) of the Electrical Safety Orders.
 - 1. A summary copy of this program (see attached for current version) will be kept in each vehicle which may use electrical equipment subject to this regulation.
 - 2. The persons designated to implement this program are the corporate safety officer and equipment manager.
 - 3. Each cord set, attachment cap, plug and receptacle of cord sets, and any equipment connected by cord and plug including those which are not required to be grounded, shall be visually inspected before each day's use for external defects, such as, deformed or missing pins or insulation damage, and for indication of possible internal damage. Equipment found damaged or defective shall not be used until repaired.
 - 4. Each new employee will be trained in the requirements of this program upon hire. It shall also be reviewed periodically at tailgate and/or safety meetings.
 - 5. The division responsible for the equipment shall test the equipment for continuity and correct attachment of the grounding conductor. This will be done quarterly within the first two weeks of each calendar quarter. All newly purchased equipment shall be tested before being placed in service. All equipment, which can reasonably be suspected to have been damaged, shall also be tested. Any equipment that does not pass the examination process shall be removed from service until repaired and retested.



ASSURED GROUNDING PROGRAM

All portable electric tools, drop cords, extension cords and similar items will be visually inspected daily before being put to use. Any items showing signs of possible damage will not be used until repaired as indicated and tested.

All portable electric tools, extension and drop cords, fixed temporary wiring and receptacles will be tested for continuity of the conductors and for the connection to the exposed frame in the case of tools. All cord fittings and receptacles will be tested to make certain the conductors are connected to the proper terminals.

Tests will be made at the following times:

- A. Before first use of any item.
- B. After repairing any item before it is put back into service.
- C. After any incident which might reasonably be suspect of causing damage.
- D. At intervals not to exceed three (3) months.

Any item passing the test anytime during the periods listed below will be marked with tape in the color assigned to that period.

January, February, March	White
April, May, June	Green
July, August, September	Blue
October, November, December	Red



SAFE LIFTING IS EASY LIFTING

The single most frequent and serious type of injury at Penhall Company is caused by improper lifting techniques. Proper care of your back is critical to a successful career in construction. We recommend that you take time before beginning your shift to limber your muscles by performing some simple stretching exercises, then pay careful attention to these lifting methods.



Incorrect lifting methods require unnecessary effort and often cause back injuries. The safe way to lift, is, at the same time, the easy way to lift. Briefly, the right way to lift follows:

1. Directly face the object to be lifted.
2. Move as close as possible to the object
3. Part your feet, with one foot alongside the object, the other foot behind the object. Get a secure footing.
4. Bend at the knees to lower yourself.
5. Keep your back as straight (in a line) as possible, nearly upright. Tuck in your chin to help your neck continue the straight line.
6. Grasp the object firmly, using the full palm with fingers extended around the object. Pull your elbows in against your body.
7. Lift gradually by straightening your legs, keeping your back straight.



RULES FOR USE OF OXYGEN, ACETYLENE AND OTHER FUEL GASSES

1. Bottles must be secured during use or transportation. Safety caps must be in place during transportation and storage.
2. Store oxygen, acetylene, propylene and other fuel-gas bottles secured in an upright position. There must be a minimum of 20 feet separation or a 5-foot high, non-combustible barrier between compressed oxygen and any compressed fuel gases. Keep full and empty bottles stored separately, tagging empty bottles when possible.
3. Acetylene is to be transported, stored and used in a secured, vertical position only. If conditions require temporary transportation in a near horizontal position (not less than 30 degree angle, valve up), acetylene bottles must be set upright for at least a half hour to stabilize before connecting regulators and first use.
4. Gauges and regulators must be removed before bottle transportation and storage, especially in enclosed areas (truck boxes).
5. Never drag cylinders. They may be rolled on the bottom edge for a short distance only.
6. A minimum 10:BC fire extinguisher must be kept near torching operations. A pressurized water spray container can be an additional aid, but not as a substitution for proper fire extinguisher.
7. Oil, grease, and other combustibles **MUST** be kept away from oxygen cylinders, valves, and fittings. **THEY CAN CAUSE AN EXPLOSION, WITHOUT A SPARK!**
8. Inspect hoses, fittings and torches for excessive wear, breaks, cracks, etc. Do not use damaged equipment. Obtain replacements and return the red-tagged originals to the shop.
9. Valves should be opened slightly and closed immediately (i.e., "cracked") to clear dust and debris before connecting the regulator (exception: near open flame or combustibles). Stand to one side, never in front of valve.
10. A reverse flow check valve is to be placed in each supply hose, at the torch butt, not at the regulator. Flashback arrestors are similarly required by some agencies. Once the regulator is in place, open the bottle valve slowly to avoid damage to the regulator and do not open more than 1 ½ turns; ¾ turn suggested. Never use a hitting action to open valves. A suitable wrench must be kept with the torch set at all times. Don't stand in front of valve face when opening, as this is the weakest link.
11. In normal operations, oxygen should be set at 50 PSIG, propylene at 25 PSIG, and acetylene must be kept at or below 15 PSIG.
12. Eye protection with side-shields and a minimum shade number of 5 must be worn during torching operations.
13. Torches shall be lighted by friction lighters or other approved devices, and not by matches, hot slag, cigarettes or cigarette lighters.
14. Avoid grabbing a torch above the handle, it gets hot!
15. Ask questions if you are unsure of any procedure or technique. It's too late after an accident.



EMPLOYEE RIGHTS AND RESPONSIBILITIES UNDER THE OSHA HAZARD COMMUNICATIONS STANDARD ("HAZCOM")

What is HazCom?

HazCom says that all employees must be trained about:

1. the hazardous substances they are working with, and
2. what they need to do to protect themselves from injury or illness.

What hazardous substances are present on construction sites?

Many common construction products are considered hazardous. Most will fall into five broad hazard categories: flammable & combustible liquids, compressed gases, poisons, corrosives, and breathable dusts, fumes, mists and vapors.

How do I know which products I'm using are hazardous?

All hazardous products sold must have a label that explains the dangers of the product. These labels include such words as "caution", "warning", "corrosive", "danger", "toxic", "flammable", etc. The labels tell you the proper way to use the product. Also, each hazardous product has a Material Safety Data Sheet ("MSDS") which explains the dangers of the product in great detail. We have a file of these sheets available for you to review. You may obtain copies of individual MSDS's through the shop manager, branch safety officer, or your superintendent.

What do I need to do when working with hazardous substances?

There are three ways a hazardous substance can hurt you: if you breathe it, eat it or touch it. When working with these substances, you must always follow the safety rules of our company and the guidelines outlined on the labels and MSDS's. Make sure you wear the necessary protective gear and have adequate ventilation when working with hazardous substances. You should also know what to do in case of an emergency or accident.

What if I'm just working around someone who is using hazardous substances?

Even if you're only near someone who is using hazardous products, you still need to protect yourself. Make sure you have the appropriate protective gear such as coveralls, safety glasses, and respirator, and make sure there is good ventilation.

How can I find out more about HazCom?

We have a written hazard communication program that outlines our responsibilities under the HazCom rule. It also has an inventory list of all the hazardous products that we use. This written program is also available for you to review.



HAZARD COMMUNICATION PROCEDURES

A. COMPANY POLICY

In order to protect the health and safety of our employees, the Penhall Company has developed this Hazard Communication Program.

1. As a company we intend to provide information about hazardous chemical substances used in construction through a comprehensive Hazard Communication Program.
2. This written Hazard Communication Program applies to all operations that may expose employees to hazardous substances as a result of normal work conditions or as the result of a reasonably foreseeable emergency.
3. This written Hazard Communication Program is available, upon request, to employees, their designated representative (collective bargaining agent) and the Chief of the division of Occupational Safety and Health.
4. Unless notified otherwise, the Safety Officer of each branch, division, or subsidiary is designated as the person responsible for implementing this written program. The Corporate Safety Officer will coordinate this effort which includes training and assisting the Local Safety Officer of each branch, division or subsidiary.

B. IDENTIFICATION OF HAZARDOUS SUBSTANCE USE IN THE WORKPLACE

1. "Hazardous Substances" are materials or mixtures that are physical or health hazards or are included on the OSHA Director's List of Hazardous Substances.
2. "Exposure" is any situation arising from work conditions where an employee may ingest, inhale, absorb or otherwise come in contact with a hazardous substance.
3. Each Local Safety Officer shall maintain at each office a list of and the current MSDS for all of the hazardous substances to which employees may be exposed to during the normal course of employment, using the same chemical name reference on the appropriate MSDS's for those substances. The MSDS shall be maintained for thirty (30) years or the listing of the material's identity, when and where it was used could be kept for thirty (30) years after last use. See Section G for the current list of common substances for Penhall Company job sites and shops.

4. A master list of all the substances at the various locations as well as a complete set of MSDS's shall be maintained at the Corporate Office by the Corporate Safety Officer. It is the Local Safety Officer's responsibility to provide the Corporate Safety Office with any additions, changes or deletions that occur.
5. Material Safety Data Sheets (MSDS's) are documents that supply information about a particular hazardous substance or mixture. Manufacturers are required to provide MSDS's when the hazardous substances are sold to distributors or purchasers.
6. A hazardous substance shall not be used when an MSDS for the substance is not "in hand".
7. An MSDS shall be provided an employee, upon request, during his/her work shift. A MSDS shall also be available, upon request, to an employee's designated representative, physician or to the Division of Occupational Safety and Health.
8. Company management shall be alert to other employers whose work on job sites may expose our employees to additional hazardous substances. When it appears such exposure will occur, MSDS's for the substances must be obtained. Employees will also be trained to watch for hazardous substances and request MSDS when no company management personnel will be on the job site.
9. When doing renovation or remodeling work, management and/or supervising staff shall be alert to the dangers which might exist for our employees who work under or near unlabeled pipes which might contain hazardous substances, and shall take proper precautions.
10. The Local Safety Officer shall also post the access to "Medical and Exposure Records" (S-11) poster where other employee notices are regularly posted.

C. LABELS

1. When hazardous substances are received, the Local Safety Officer (or designee) shall examine the containers to determine if the labels provide the following information:
 - a. The identity of the hazardous substances they contain; and,
 - b. Appropriate warnings of the physical and health hazards associated with those substances.

2. When hazardous substances are transferred into portable containers, the Local Safety Officer (or designee) shall ensure that the portable containers are labeled with the following information:
 - a. The identity of the hazardous substances they contain; and,
 - b. Appropriate warnings of the physical and health hazards associated with those substances.

Portable containers may be labeled with an extra copy of the manufacturer's label or with a printed label which includes (a) and (b) above.

EXCEPTION: When an employee transfers a hazardous substance into a portable container for his/her own immediate use, the portable container need not be labeled, *but must have the contents identified with a simple marking, such as: "Gas" or "Mixed Gas", "Diesel" or "Used Oil"*.

3. Each local Safety Officer (or designee) shall ensure that the labels on containers of hazardous substances are not removed or defaced, unless the containers are immediately relabeled with the following information:
 - a. The identity of the hazardous substances they contain; and,
 - b. Appropriate warnings of the physical and health hazards associated with those substances.
4. Containers without complete labels or with defaced labels will not be used on the job.
5. Replacement labels can be obtained through the Corporate Safety Officer.

D. INFORMATION AND TRAINING

1. When employees are exposed, or could be exposed, to hazardous substances in their work area, they shall be provided information and training by the Local Safety Officer based on the data contained in the MSDS's for those hazardous substances.
2. Training shall be provided before employees are assigned duties that may cause exposure to hazardous substances. Training shall also be given when new hazardous substances are introduced into the work area or when a MSDS is materially changed.

3. Training shall be conducted and documented at safety meetings, and shall provide at least the following:
 - a. Information on which hazardous substances are in the work area
 - b. How to read and interpret information on MSDS's and labels.
 - c. Any physical or health hazards associated with the use of a hazardous substance or mixture being used in the work area.
 - d. Proper precautions for handling, including specific procedures the company has implemented to protect workers from exposure such as personal protective equipment and work practices.
 - e. Emergency procedures for spills, fires, disposal and first aid
 - f. Three methods and observations that can be used to detect the presence of a hazardous substance in the work place (odor, visual appearance or monitoring)
 - g. The right of employees, their physicians or their collective bargaining agents to receive information on hazardous substances to which they may be exposed.
 - h. The right against discharge or discrimination due to an employee's exercise of the rights afforded by law.
 - i. The details of this written Hazard Communication Program, the availability and location of this written Hazard Communication Program and of MSDS's or other information.

E. NON-ROUTINE TASK TRAINING

When employees are assigned to a non-routine task that may expose them to a hazardous substance for which they have not been trained, they shall be trained in the manner required by Section D, above.

F. ACCESS TO INFORMATION BY OTHER EMPLOYERS

When employees of another employer may be exposed to hazardous substances while working on one of our job sites, the employer shall be provided with a list of the hazardous substances we are using at that job site by an authorized representative. This person shall also give the employer suggestions for appropriate protective measures needed for exposure to such substances. If requested by the employer, names and addresses of suppliers or manufacturers of the hazardous substances we use shall also be provided so that the employer may obtain MSDS's and other information.

G. POTENTIALLY HAZARDOUS SUBSTANCES COMMONLY FOUND ON COMPANY PROPERTY AND / OR JOB SITES

COMMON JOB SITE SUBSTANCES

Acetylene gas	Antifreeze
Diesel oil	Gasoline
Hydraulic fluid	Lubricating oils and greases
Metal bonded diamond blades and bits	Oxygen gas
Propylene gas	Rock drill oil

COMMON PERMANENT SHOP OR YARD SUBSTANCES

Abrasive wheels	Acetylene gas
Antifreeze	Battery acid
Brazing alloys and fluxes	Covered electrodes
Cutting oils	Diesel oil
Gasoline	Hydraulic fluid
Lubricating oils and grease	Metal bonded diamond blades and bits
Motor oil additives	Oxygen
Penetrating oil	Propylene gas
Rock drill oil	Solvents
Toluene	Transmission fluid

SPECIFIC HAZARDS (Specific training to be provided before exposure)

Asbestos	De-foamer in grinding slurry tanks
Lead in painted surface coatings	Neoprene lubricants and adhesives
Nuclear radiation	Polyurethane primer and joint sealant, Parts A & B
Rock-bit dust, Silica	



OSHA STANDARD FOR PERSONAL PROTECTIVE EQUIPMENT

The following program is an overview of the OSHA standard for employee personal protective equipment. OSHA standard 1910.132, General Requirements for Personal Protective Equipment of General Industry, requires employers to:

1. Perform a hazard assessment and equipment selection.
2. Inform all affected employees of the hazards and the type of equipment that will be used to protect them
3. Ensure that each employee is properly fitted
4. Verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace and the persons certifying that the evaluation has been performed
5. Mandate that defective or damaged PPE shall not be used and determine the extent of applicable "defect or damage." (When is a scratch on safety glass lenses a defect to which an OSHA compliance officer might give a citation?)
6. Train each employee to know, at a minimum, the following:
 - ☐ when PPE is necessary,
 - ☐ what PPE is necessary,
 - ☐ how to properly don, doff, adjust and wear PPE,
 - ☐ PPE's limitations, and
 - ☐ proper care, maintenance, life and disposal of PPE
7. Test employees or ensure that employees can demonstrate understanding of the training covered and the ability to use the PPE properly before being allowed to perform work requiring the use of PPE. The employer must first define the learning objectives of the training required.
8. Retrain an employee when there is reason to believe that an affected employee who has undergone training does not have the understanding and skill required
9. Verify that each affected employee has received and understands the required training through written certification bearing the name of each employee trained and the subjects of certification



Respiratory Protection Program and Procedures

1. Purpose

Cal-OSHA requires that employees exposed to harmful contaminants on the job must be provided with, and wear, respiratory protective equipment. (General Industry Safety Orders, Section 5144).

2. Determination of Respirator Usage

- 2.1. When it is clearly impracticable to remove harmful dusts, mists, fumes, gases, or vapors, at their source through the use of engineering controls (i.e. ventilation units), or when protection against occasional and/or relatively brief exposures is needed, Penhall Company shall provide, and the employee exposed to such hazard shall use, approved respiratory equipment.
- 2.2. Employees are required to wear this protection in the following instances:
 - 2.2.1. When so directed by supervision;
 - 2.2.2. When the employee feels that the use of such protection may be warranted.

3. Types of Exposure

The following is a list of the types of respiratory hazards to which employees of Penhall Company may be exposed, along with brief descriptions of these hazards:

- 3.1. Dusts: Solid particles produced by processes such as grinding and mixing
- 3.2. Mists: Tiny liquid droplets given off when liquids are sprayed, mixed, or agitated in processes such as dipping, painting, and machining.
- 3.3. Gases: Substances that are neither solid nor liquid. Chemicals such as hydrogen sulfide, chlorine, and carbon dioxide exist under normal conditions in gaseous states. They can become liquid under pressure.
- 3.4. Vapors: Very similar to gases, they are formed by the evaporation of liquid substances such as water, trichloroethane, and solvents.

4. Determination of Exposure Levels

- 4.1. When possible, before requiring the use of respirators, Penhall Companies shall evaluate the degree of exposure to a hazardous substance through means of testing and laboratory analysis, in order to determine whether or not an exposure above the OSHA established levels actually exists. In some situations, such pre-testing may not be possible. In those instances, employees may be required to use respirators until such time as a formal assessment of the situation can be made.
- 4.2. Testing of those areas where exposure levels indicate that respirator usage is made mandatory will be conducted on an annual basis.

5. Selection and Purchasing of Equipment

- 5.1. Whenever respirators are required to be used to control potentially harmful exposures, Penhall Companies shall only purchase respiratory equipment which has been approved for that purpose and certified by one or more of the following agencies:
 - 5.1.1. The Mining Enforcement and Safety Administration
 - 5.1.2. The National Institute for Occupational Safety and Health (NIOSH)
 - 5.1.3. The Occupational Safety and Health Administration (Federal or State) – OSHA
- 5.2. Such equipment shall only be purchased through an approved vendor of safety equipment, and only parts approved for the specific respirator system shall be used for replacement.

6. Types of Equipment

- 6.1. The following basic types of respiratory equipment shall be kept available at all times for use by the employees of Penhall Companies:
 - 6.1.1. Dust Masks (use for metal finishing, sweeping, sawing, etc.)
 - 6.1.2. Organic Vapor (use for paints, adhesives, solvents, etc.)
 - 6.1.3. Organic Vapor / Acid Gas (use for processing tanks, some adhesives, etc.)
- 6.2. Other respiratory equipment will be made available to the employee if and when needed.

7. Training Program

- 7.1. Each employee who is issued a respirator will receive training as regards the proper usage, inspection procedure, sanitary care, and limitations of this equipment. Employee will also be instructed in how to test for a gas-tight fit around the facial areas (leak test), and in identifying those situations that may prevent such a seal from being formed (facial hair). Contact lenses may not be worn in conjunction with respiratory equipment.
- 7.2. No person shall be assigned the use of a respirator until after they have received training in the safe use of such equipment.

8. Maintenance and Sanitary Care of Respiratory Equipment

- 8.1. Penhall Companies shall provide, repair, or replace respiratory equipment as may be required due to wear and deterioration. The Company shall also provide means for cleaning all non-disposable type equipment. Routinely used respiratory equipment is to be kept clean by the person to whom the equipment was issued.
- 8.2. Respirators are to be stored in a convenient, readily accessible, clean, and sanitary location. Respirators in storage should be checked on a quarterly basis (as a minimum) to ensure that they have not deteriorated.
- 8.3. Whenever possible, respirators shall be issued to individual employees. The employee should make an identifying mark upon the respirator (using indelible ink) in such a manner that the fit and function of the respirator is not impaired. The date of issuance is to be recorded. Respiratory equipment shall not be passed on from one employee until it has been cleaned and sanitized.

9. Medical Surveillance of Program

- 9.1. The Company designated physician on an annual basis shall examine employees of Penhall Companies who may be required to wear respiratory protection. Such employee job classifications may include (but not be limited to):
 - 9.1.1. Spray painters
 - 9.1.2. Metal finishers
 - 9.1.3. Welders
 - 9.1.4. HazMat workers

- 9.1.5. Any other job classification which normally has potential exposure to respiratory system hazards
- 9.2. No person shall be assigned the use of a respirator until after they have passed a medical evaluation to verify that they may use such equipment safely.
- 10. Atmospheres Immediately Harmful to Life or Health
 - 10.1. In atmospheres immediately hazardous to life or health, a minimum of two persons equipped with approved respiratory equipment, in addition to other necessary safety equipment, shall be on the job. Communication shall be maintained between both (or all) individuals present. Standby persons, at least one of which shall be in a location which will not be affected by any reasonably foreseeable incidents, shall also be present with suitable rescue equipment, including self-contained breathing apparatus.



Respirator Program

Employees exposed to harmful contaminants on the job must be provided with and wear respirators.

OSHA states that respirators should not be a permanent means of limiting the amount of dangerous chemicals a worker may breathe. Engineering controls such as installing ventilation ducts to remove the harmful materials out of the air are much more preferable. Respirators should be worn under the following conditions:

1. It is clearly impractical to remove harmful contaminants at the source.
2. As a temporary measure while engineering controls are being installed.
3. For emergency escape and rescue.

OSHA's Eleven Points of a minimally acceptable respirator program:

1. Written standard operating procedures governing the selection and use of respirators shall be established.
2. Respirators shall be selected on the basis of hazards to which the worker is exposed.
3. The user shall be instructed and trained in the proper use of respirators and their limitations.
4. Where practical, respirators should be assigned to individual workers for their exclusive use.
5. Respirators shall be regularly cleaned and disinfected.
6. Respirators shall be stored in a convenient, clean and sanitary location.
7. Respirators shall be inspected regularly and all deteriorated parts replaced.
8. Appropriate surveillance of work area conditions and degree of employee exposure or stress shall be maintained.
9. There shall be regular inspection and evaluation to determine the continued effectiveness of the respirator program.
10. Persons should not be assigned to tasks requiring use of respirators unless it has been determined that they are physically able to perform the work and use the equipment. A physician shall determine what health and physical conditions are pertinent.
11. Only approved and accepted respirators shall be used when they are available.

Types of Respiratory Hazards:

The type of respiratory hazard will determine the kind of respirator that should be used. Listed below are the types of hazards:

1. Dusts are solid particles produced by processes such as grinding, crushing and mixing.
2. Mists are tiny liquid droplets given off when liquids are sprayed, mixed or agitated in processes such as dipping, painting, and machining.
3. Fumes are tiny metallic particles given off when metals are heated in processes such as welding, soldering, casting, and galvanizing.
4. Gases and vapors are substances that are neither solid nor liquid. Substances such as hydrogen sulfide, chlorine, and carbon dioxide exist under normal condition in gaseous states. They become liquid under pressure. Vapors are like gases except that they are formed by the evaporation of substances, such as water or trichloroethylene, which occur ordinarily as liquids.
5. Oxygen deficient atmospheres occur when the oxygen in the air has been used up in processes such as rusting or fires, or when another gas pushes the oxygen out. Oxygen deficiencies occur most frequently in confined spaces such as tanks, tunnels, or sewers.

The selection of the proper respirator involves three basis steps:

1. Identification of the hazard
2. Evaluation of the hazard
3. Selection of the proper respirator



SAFETY OFFICE MEMORANDUM

To: Division Managers
From: Steve Lemaster, Corporate Safety Officer
Date: March 17, 1997
RE: Respirator Fit Testing and Pulmonary Function Tests (PFT)

We are putting together a roster of all employees who will or have been issued or use respirators. This will help us in our initial and follow-up training and testing requirements. This information will be added to my master list of supervisor and employee training and qualifications, which will be used to help identify re-training / re-certification needs and to issue timely reminders (more information will follow on this subject).

Employees must be evaluated by a physician in regards to whether they have the lung capacity (PFT) and mental stability (not claustrophobic) to handle wearing a respirator in the course of their normal work. This might entail a questionnaire administered by your local industrial clinic's doctor. Managers should schedule a respiratory medical screening for each employee that wears more than a nuisance type dust mask. This is required before issuance of a respirator and/or if the employee participates in a required medical surveillance program. The Penhall Company Lead Program requires employees that work with lead (typically structures that have been painted with lead containing paint/coatings) and that are exposed above the action level of lead over thirty days per year, be included in a medical surveillance program.

We must also make sure that our employees are fit tested for the specific respirator that they are using / going to use. Often, the industrial clinic can do this in conjunction with the respirator evaluation / PFT. However, a trained supervisor, with simple materials, tools and techniques can do this. I can assist in supervisory training, doing joint fit tests so that the supervisor can handle future needs. A couple of videos from respirator manufacturers are available, which will help make this more easily accomplished. The OSHA standard requires fit testing upon issue of a new type of respirator and at least every six months.

Supervisors must evaluate the employee's current training needs, including their discipline and ability to follow strict rules regarding the care and use of respirators. We have written materials (the Penhall Company Respiratory Protection Program and Hazardous Communication Program) and videos that will aid in their training. An employee Training Verification form must be completed with the employee, and forwarded to the Corporate Safety Office. Without an employee's knowledge of the hazards and controls, and their commitment to abide by the rules and to wear and maintain their protective equipment, the whole program loses its effectiveness.

Please send in the names, employee and division numbers, trade and type(s) of respirator(s) used, the date they were evaluated by a doctor and fit tested on the respirator listed. You can use the form at the end of this memo or your own forms / notes.

PENHALL COMPANY

Respiratory Protection Program

Medical Screening / Pulmonary Function Test and Fit Test Record

Div.	Employee Name	Empl. No.	Trade	PFT (date)	Resp. Mfgr., & Type	Fit Tested (date/tester)

Penhall Company
Accident Investigation Form

Accident Investigation Long Form.doc

Report prepared by: _____

☐ Preliminary report

Date of report: _____

☐ Final report

Project Information:

Jobsite name: _____ Job number: _____

Address: _____

Contractor: _____ Penhall Co. Foreman: _____

Contractor Superintendent: _____ Penhall Co. Superintendent: _____

Contractor Foreman: _____ Penhall Co. Safety Coordinator: _____

Employee / Incident Information:

Employee name: _____ SSN: _____ DOB: _____

Address: _____ Phone number: _____

Date of hire: _____ Job title: _____ Wage \$ _____ per hour

Years in occupation: _____ Schedule at time of injury: _____

Exact location of incident (Bldg/Level/Area): _____

General task at time of incident: _____

Specific activity at time of incident: _____

Injury / Illness Information:

Date of incident: _____ Day of week: _____ Time of incident: _____

Date reported to Penhall Corp: _____, or date reported by Subcontractor: _____

Type of injury: _____ Part of body injured: _____

Was first aid given onsite? ☐ Yes ☐ No If yes, by whom: _____

Was employee taken to medical facility offsite? ☐ Yes ☐ No Date: _____

Treating facility and phone number: _____

Transported by: ☐ Ambulance ☐ Company vehicle ☐ Private vehicle Name of Driver: _____

Employee returned to: ☐ Regular work ☐ Modified work If not, estimated return date: _____

Incident Designation: ☐ Near Miss ☐ First Aid – No Claim ☐ First Aid – Medical Only

☐ Recordable – Medical Only ☐ Recordable – Lost Time ☐ Denied

Describe in detail the circumstances of the incident (attach diagrams, drawings or photos of accident scene). Give a chronological sequence of events. If materials and/or equipment were involved, start before the materials/equipment were brought to the incident scene describing who, what, where, when, and how:

[illegible]

A simple line drawing of a human figure from the back, showing the spine, shoulders, arms, and legs. The figure is standing with arms slightly away from the body. The drawing is composed of clean, black outlines on a white background.

Additional Information:

Name of witnesses and others working with injured worker (attach witness statements):

Immediate Supervisor: _____ Crew size: _____

Object, substance, equipment inflicting injury/damage _____

Equipment involved in incident (description/model/serial #):

PPE (personal protective equipment) worn at time of incident: _____

Safety equipment and training required for job: _____

Site Specific Safety Plan created for this project? ☐ Yes ☐ No Date: _____

Does employee normally operate this equipment? ☐ Yes ☐ No Was employee instructed in the safe use of this equipment?

☐ Yes ☐ No When / How?: _____

Was any defect with the equipment noted or reported prior to accident / incident? ☐ Yes ☐ No Date: _____

Was any recent maintenance / service performed on this equipment? ☐ Yes ☐ No Date: _____

If YES, when/ what? _____

Were standard work procedures followed? ☐ Yes ☐ No If NO, why: _____

Describe standard work procedures (attach copy of written procedures, or site specific safety plan):

Was a safety rule or specific instruction violated? ☐ Yes ☐ No If YES, what? _____

When / how was this rule, regulation or specific instruction communicated to the injured?

**Employee / Witness Statement
(copy as many times as needed)**

I _____ am submitting this statement made on _____ to
(employee / witness name) (date)

_____ for Penhall Company. I am submitting this statement of my own free will.
(investigator's name)

I have not been coerced or threatened in any way to submit this statement.

Employee / Witness name (print) and signature:

Today's date:

Company:

Home Address:

Home Phone:

Consider:

- Where were you when the incident took place?
- What activity was being performed prior to the event?
- What happened? Tell a story.
- What do you believe happened?
- Any other information or details?

Statement:



BASIC FIELD SAFETY REQUIREMENTS

[Code of Safe Practices]

FOR ALL EMPLOYEES:

1. Hard hats are required on all job locations.
2. All employees shall follow safety rules, render every possible aid to safe operations, and report all unsafe conditions or practices to the foreman, superintendent, or safety officer. The report should be in writing whenever possible. No employee will be disciplined for notifying the company of any workplace hazard or unsafe condition.
3. All employees must immediately report any injury, illness, or accident of any kind to the foreman or superintendent.
4. Foreman shall insist on employees observing and obeying every rule, regulation, and order as is necessary for the safe conduct of work, and shall take such action as is necessary to obtain observance.
5. Anyone known to be under the influence of drugs, intoxicating substances, or any circumstance (e.g., illness, fatigue, etc.) which impair the employee's ability to safely perform the assigned duties, shall not be allowed on the job while in that condition.
6. Horseplay, scuffling, or other actions that could adversely influence safety are prohibited.
7. Employees shall not enter manholes, underground vaults, soffit chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been determined by a competent person that it is safe to enter.
8. Employees shall be instructed to ensure that all guards and other protective devices are in place and adjusted, and shall report deficiencies promptly to the foreman or superintendent.
9. When lifting heavy objects, be prepared (warmed up), keep the load as close as possible to the body, bend the knees and lift using the leg muscles.
10. Employees must wear safe shoes. This means at the very least, leather work shoes (not athletic footwear) which are free from split seams, holes and dragging laces. Rubber boots may be worn if desired, but they must have rigid toes.
11. Respiratory equipment must be worn when there is an exposure to respiratory hazards. Training, equipment, personal fit testing, and monitoring appropriate to the hazard will be provided.
12. Orange safety vests will be worn during any street work (reflective for night work) and when appropriate, your vehicle should be placed between you and oncoming traffic.
13. Good housekeeping is essential. The proper care and attention to the location of hoses, electrical cords, standing water, miscellaneous tools and materials, etc., will be explained at safety meetings.
14. Employees shall clean thoroughly after handling hazardous substances, and follow special instructions from authorized sources. Material Safety Data Sheets (MSDS) are available through your supervisor.
15. Gasoline shall not be used for cleaning purposes. Approved and labeled safety cans will be used to store and dispense gasoline.
16. Damaged tools or equipment shall be removed from service and tagged "DEFECTIVE".
17. Materials, tools, or other objects shall not be thrown from buildings or structures until proper precautions are taken to protect others from the falling objects.
18. Ladders, scaffolds, and / or lift equipment may be provided to access elevated work areas. These must be used and maintained in accordance with the specific training provided.
19. Any work at an elevated location that presents a fall hazard to personnel or equipment will follow our fall protection program guidelines.
20. Working safely is a condition of employment. All employees must follow these and other appropriate safety directives. Disciplinary action, up to and including termination, will be taken against employees who don't observe safe work methods.

Diamond Workers:

1. Ear and eye protection will be worn while operating equipment.
2. Verify proper ventilation when operating gas powered equipment indoors. If at all doubtful about adequate ventilation, do not take chances. Use catalytic converters and fans or have electric powered machinery sent out.
3. Be aware of what is below you or on the other side of the wall when cutting or drilling. Have the area barricaded or monitored if there is any chance of concrete falling where you can not see it.
4. Ask about utilities that may be located in the concrete or just below grade. Verify with a competent person once utilities are located that they are turned off.

Laborers / Compressor Work:

1. Ear protection must be worn while operating equipment or performing labor near an operating compressor or breaking operations.
2. Eye protection must be worn whenever breaking, chipping, grinding or related work is done.
3. Air hoses should not be disconnected from compressors until the hose line has been bled. Hoses and tools will have safety clips (or similar devices) at all joints.
4. Compressed air should not be used to clean an area unless all personnel in the vicinity are properly protected. If materials are suspected to be hazardous, the area should be posted as a potentially hazardous work area.
5. Welding goggles / glasses must be worn when performing torch work. See "Rules for Use of Oxygen, Acetylene and Propylene" for complete details of these safety procedures.
6. No burning, welding, or other source of ignition shall be applied to any enclosed tank or vessel, even if there are some openings, until it has first been determined that no possibility of explosion exists, and authority for the work is obtained from the foreman or superintendent.
7. Compressed gas cylinders shall be stored in a secured, upright position, with protective caps in place.

Equipment Operators:

1. Equipment should not be operated near power lines where there is an overhead snagging exposure or in enclosed areas where there is danger of carbon monoxide poisoning.
2. Ear and eye protection must be worn when using breaking tools.
3. Equipment must be inspected for proper working order before use, and should not be refueled, repaired or adjusted while running.
4. Maximum equipment loads should not be exceeded.
5. Seat belts must be worn while operating any piece of equipment that is so outfitted.

Shop Personnel:

1. Proper eye protection must be worn when grinding.
2. Welding goggles / glasses must be worn and adequate ventilation maintained when welding or cutting.

Driving Company Vehicles:

1. Seat belts must be worn whenever operating a vehicle. The driver will be responsible for paying any fine issued for non-compliance of mandatory seat belt laws.
2. Make sure all loads are secured well through the use of tie down ropes or chains. Cover loads where appropriate to minimize loss of debris.
3. Drive defensively; this means following the 2, 3, or 4 second rule. Here's how it works:
 - a. When the driver ahead of you passes a fixed object like a tree, telephone pole, underpass or billboard, you start counting: one thousand one, one thousand two, one thousand three, one thousand four. Two seconds is used for passenger vehicles, three for pick-ups and four seconds is for larger trucks or pick-ups towing equipment.
 - b. If your vehicle reaches that fixed object before you finish counting, you are following too close and you're asking for trouble. Widen the gap until you have a proper margin for safety. Add an extra second or two under adverse conditions.

NOTE: These Basic Field Safety Requirements (Code of Safe Practices) are part of a comprehensive, written Injury and Illness Prevention Plan (IIPP). Copies are available from your supervisor and at each Penhall Company office.

I, _____ have been given a copy of, read and been instructed on Penhall's "Basic Field Safety Requirements." I understand that compliance with these and subsequent safety directives is a condition of employment at Penhall Company.

Signature

Date